

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff

Case Number

vs.

22-cv-10794

CAROLINE ELLISON and
ZIXIAO ("GARY") WANG

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff

Case Number

vs.

22-cv-10501-PKC

SAMUEL BANKMAN-FRIED

Defendant

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

Complaint filed on December 13, 2022.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The instant action charges two defendants with securities law violations based on their participation in the same securities fraud scheme alleged in the earlier-filed action. Per Rule 13 of the Rules for the Division of Business Among District Judges, the two actions: (A) concern the same or substantially similar parties, property, transactions and events; (B) there is substantial factual overlap; (C) the parties could be subjected to conflicting orders; and (D) absent a determination of relatedness, there could be a substantial duplication of effort and expense, delay, or undue burden on the Court, parties or witnesses.

Signature:

/s/Jorge TenreiroDate: Dec. 21, 2022U.S. Securities and Exchange Commission

Firm: